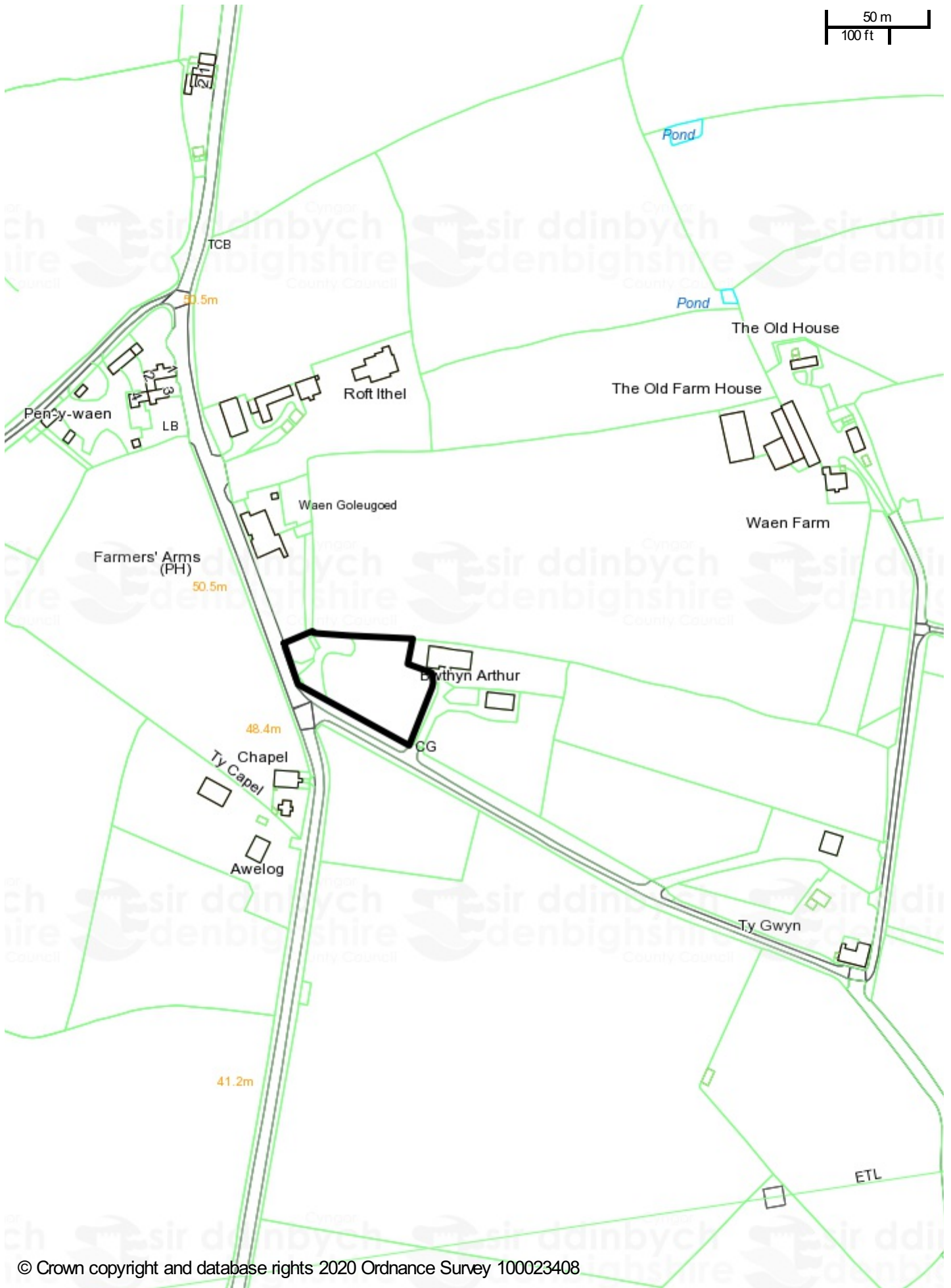


50 m  
100 ft



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47/2020/0237

Scale: 1:2500

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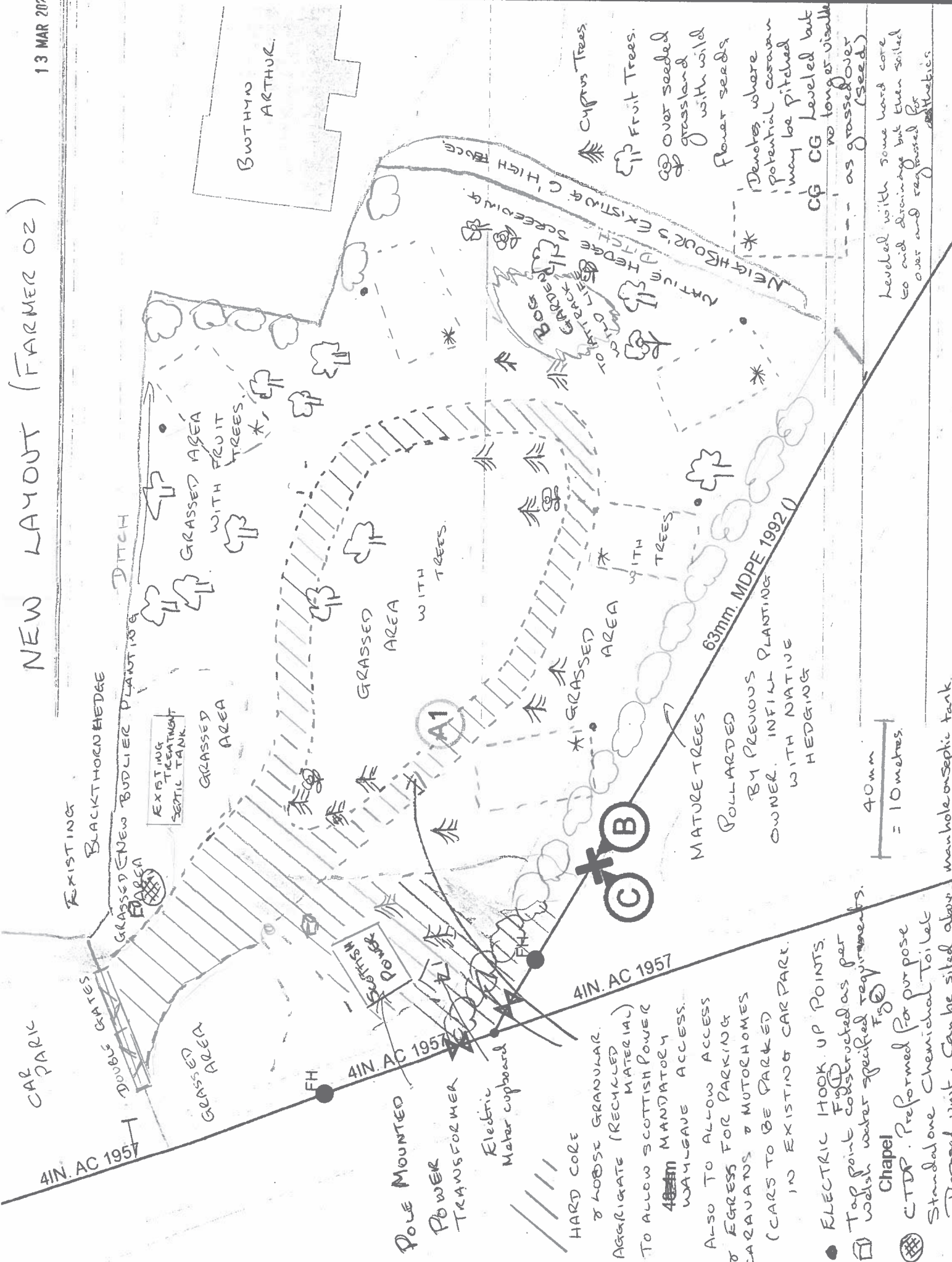


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# NEW LAYOUT (FARMER OZ)

13 MAR 2017



OWI of that

40mm = 10 metres

- ELECTRIC HOOK UP POINTS. Fig 1
- Top point constructed as per water specified requirements. Fig 2
- Chapel
- CTDP. Performed for purpose Standalone Chemical Toilet Disposal unit. Can be sited above manhole on septic tank.

4IN. AC 1957

POLE MOUNTED POWER TRANSFORMER

Electric Meter cupboard

HARD CORE & LOOSE GRANULAR AGGREGATE (RECYCLED MATERIAL) TO ALLOW SCOTTISH POWER 400mm MANDATORY WAYLEAVE ACCESS.

ALSO TO ALLOW ACCESS & EGRESS FOR PARKING CARAVANS & MOTOCHOMES (CARS TO BE PARKED IN EXISTING CARPARK.)

MATURE TREES POLLARDED BY PREVIOUS OWNER. INFILL PLANTING WITH NATIVE HEDGING

GRASSED AREA WITH TREES

GRASSED AREA WITH FRUIT TREES

NEIGHBOUR'S EXISTING C. HIGH FENCE

NATIVE HEDGE DITCH

CG CG Levelled but no longer visible as grassed over (SEED)

Denotes where potential casavan may be planted

OVER SEEDED GRASSLAND WITH WILD FLOWER SEEDS

FRUIT TREES

CYPRUS TREES

BUSHY ARTHUR

EXISTING TREATMENT SEPTIC TANK

GRASSED AREA

GRASSED AREA WITH TREES

GRASSED AREA WITH FRUIT TREES

EXISTING BLACKTHORN HEDGE

NEW BUDLIER PLANTING DITCH

DOUBLE GATES

CARPARK

4IN. AC 1957



Fig ①

# Electric Hook up POINTS

13 MAR 2020





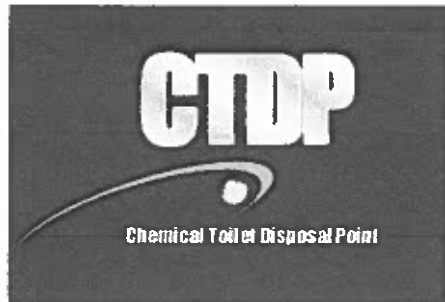


13 MAR 2020

Fig B

12/03/2020

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► Welcome

Hi Jason,

We would like to order  
another flushing unit  
for one of our other  
parks please

We are very impressed  
with the unit we

bought and have received  
great feedback from our  
customers

Paul Swalwell

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## Chemical Toilet Disposal Units

Stand Alone Chemical Toilet Disposal Units

(Also known as Elsan Tipping Points)

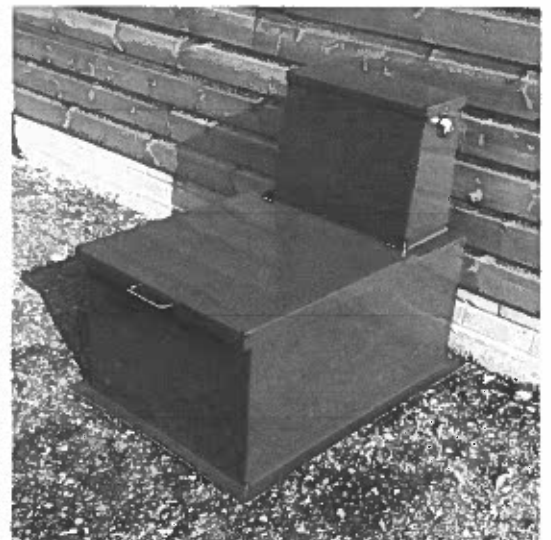
for emptying portable toilet cassettes

with or without built in flush.

Installed across the UK and Europe for over 10 years



£320+vat



£680+vat

"Dear Jason

As you know we have 3 of





**WARD :** Tremeirchion

**WARD MEMBERS:** Cllr Christine Marston (c)

**APPLICATION NO:** 47/2020/0237/ PF

**PROPOSAL:** Operational development required in association with use of land as a caravan and motorhome club certified location / exempted caravan site comprising formation of a vehicular access, internal access tracks and hardstanding areas, drinking water tap, electricity hook up points, chemical toilet waste disposal facility with rinsing tap, wildlife pond and landscaping (partly retrospective)

**LOCATION:** Land Adjacent to Farmers Arms Waen Llanelwy LL17 0DY

**APPLICANT:** Mr / Mrs Peter & Elaine Maull / Molloy

**CONSTRAINTS:** None

**PUBLICITY UNDERTAKEN:** Site Notice - Yes  
Press Notice - No  
Neighbour letters - Yes

**REASON(S) APPLICATION REPORTED TO COMMITTEE:**

**Scheme of Delegation Part 2**

- Recommendation to grant / approve – 4 or more objections received
- Recommendation to grant / approve – Town / Community Council objection

**CONSULTATION RESPONSES:**

TREMEIRCHION, CWM & WAEN COMMUNITY COUNCIL

Object.

- 1) The site is situated on a busy 60mph road. Concerns re: highways safety for towing vehicles and other road users. The 60mph speed limit has been discussed at council meetings in the past
- 2) The Health and Safety Executive stipulated and recommended that each caravan should have a minimum of 3 metres clear distance between it and the next caravan to ensure a safe distance in case of fire. Also, cars belonging to the caravan owners should be parked so as to ensure that the vehicle cannot "runaway" towards and collide with other caravan owners, caravans and or the caravan awnings. As this site is small those conditions may not be possible.
- 3) The site is agricultural in nature and should this application be granted the site will have a detrimental effect on the properties in that locality, particularly the private residence situated next to the site. Concerns include noise pollution from the site and how this would impact on the lives and enjoyment of the home owners and residents in the vicinity.
- 4) There are already several sites, suitable for touring caravans and motor homes in the locality and there is no demand or need for an additional site of this nature. Permitting another caravan site here could be detrimental to the neighbourhood.
- 5) There is high local opposition
- 6) Over-development of a small site.
- 7) The development adjoins and overlooks a residence.
- 8) It is retrospective and all works including extensive groundwork commenced without permission. This sets a precedence for future applications.

NATURAL RESOURCES WALES – No objection, NRW have provided advice to applicant regarding foul drainage and chemical toilet disposal.

DWR CYMRU / WELSH WATER – Note foul water would not connect to the mains drains and therefore no comments provided.

SP ENERGY NETWORKS (on behalf of SP MANWEB electricity distribution network operator)  
- SP Manweb have advised they have assets across the site (overhead lines and substation) which may present a risk to users of the caravan site.

SP Energy Networks, on behalf of SP Manweb, has a statutory duty to maintain electrical safety clearances around existing overhead lines, which may require felling and tree lopping. As such, any proposed landscaping in proximity to an existing line should consider the need for such works as the landscaping matures. SP Manweb would suggest only low growing shrubs be planted below overhead lines to prevent the need for lopping in the future.

DENBIGHSHIRE COUNTY COUNCIL CONSULTEES –

- Traffic, Parking and Road Safety
- Highways Officer

*Original consultation response:*

Highways Officers initially requested additional information to demonstrate that touring vehicles could safely enter and leave the site from the highway, and manoeuvre within the site to park, should the carpark be fully occupied.

Whilst acknowledging the access and existing visibility is already established, Highways Officers also requested additional information to demonstrate there is adequate visibility for a touring caravan and vehicle to access / exit the site.

Visibility splays and a swept path analysis were therefore requested.

*Re-consultation response:*

Highways Officers have recognised the number of objections on highway grounds, and comments are provided in response to the operational aspect in terms of highway element arising from the proposals and not the use of the land.

The site accessed from the public highway using the existing public house car park to the adjoining field where the caravans will be sited. The proposal does not involve a new access onto the highway. The public highway is a rural road used by a large number of agricultural vehicles accessing the surrounding land and as such the caravan towing vehicle is of similar size to the modern farming vehicles currently using this road.

Additional information was requested to ensure that this existing access could operate and be accessed and egressed safely to and from the site by such vehicles. The submitted swept path analysis demonstrates that a 4 x 4 vehicle + twin axle caravan can undertake this manoeuvre safely.

The visibility splays provided that at the point of access to the highway 102m to the South and 106m to the North can be achieved. In accordance with TAN 18, 120m on new developments should be provided.

Although there is a shortfall in standards, TAN 18 states that although the visibility splays provided are below standard and where planning applications are submitted within an existing development site and served by an existing substandard access, there should be scope for limited redevelopment that incorporates a substantial access improvement, even though the improved access would still be below standard.

Highways Officers note the gates have been re-sited further within the site which provides a splayed entrance which is deemed a safer means of access and an improvement on the former open arrangement and therefore demonstrates compliance with the visibility standards set out in TAN 18 Table B. and therefore considered to be acceptable

Highways Officers note that a similar application was granted under Code 47/2017/0792 at Waen Chapel for the formation of a car park and construction of means of access where the visibility splays did not meet standards but consideration was given to the guidelines laid out in TAN 18, as mentioned above.

It is noted that two parking bays intrude about 400mm in the visibility splay to the East, yet, this would not be large enough to fully obscure a whole vehicle and the overall envelope of visibility and therefore Highway Officers consider this will not have an impact on road safety. As seen on the swept path drawing, the turning circles are well clear of the parking bays.

There have been no reported accidents in the last five years and given the restricted use of this small scale development and the submitted details, Highways Officers do not foresee any highway related issues arising from the development and therefore have no objection to the proposals.

County Ecologist – No comments received.

Flood Risk Engineer - the proposal will need SAB approval. However, in making its decision the SAB will take account of any local knowledge or concerns regarding drainage.

## **RESPONSE TO PUBLICITY:**

### In objection

Representations received from:

Ian M Jarvis & Emma E Bateman, Glanrafon, Waen  
Mr & Mrs Seaman, The Gatehouse, Waen  
John Piper, 1 Bryn Ibod, Waen  
R & C Peacock, Bwthyn Arthur, Waen, St. Asaph  
S. & D. Jones, Waen Farm, St. Asaph  
Dr & Mrs Day, Castell, Waen, St Asaph  
Katherine Sanders, Pen y Banc, Waen  
Martin and Gemma Sivill, Plas Coch, Tremeirchion  
Geoff Roberts, Vale Cottage, Waen, St. Asaph  
John and Margaret Carter, Ysgol Isaf, Waen  
Rhodri O Roberts, Ty Gwyn Waen  
Bob & Beryl Davies, Glan Clwyd Waen.  
J & N Lighbown, Fachwen Farm, Waen  
K and A Burgoyne, 1 Salisbury Villas, Waen  
Colin Simpson, Highway Panning Service (on behalf of local residents)

Summary of planning based representations in objection:

Principle:

- Objects to principle of caravan site in this location / no need for additional caravan sites in this area.
- Operational works carried out exceed the minimal works required for a Certified Location caravan site.
- Object to the retrospective application / should have obtained planning consent prior to carrying out works.
- Not a sustainable location / poor accessibility by public transport, cycling or on foot, no local shops – development would be dependent on cars.
- Does not demonstrate how the proposal would contribute to the local rural economy.
- Loss of agricultural land.

Visual amenity:

- Works carried out are excessive in scale, and detrimental to visual amenity / character of the local rural area.
- Site is not well screened.
- Planting does not provide sufficient screening of the site.
- Excessive amount of hardstanding / tracks

Residential amenity:

- Pitches too close to neighbouring property.
- Would detrimentally impact on privacy and outlook of neighbouring property and cause noise & disturbance.

Access / Highways:

- Site is not on B5429 but on the Bod Ifan junction to A55 which is a heavily used unclassified road & road has been narrowed recently. Development would increase traffic along this unsuitable road resulting in highway safety issues.
- Existing access is close to bend in road and close to junction with unclassified road with poor visibility – slow moving caravans would not be able to access / exit site onto road safely.
- No footpaths along public roads.
- Inadequate visibility into and out of site for caravans and therefore would increase risk of collisions.
- Road traffic speed referred not available to verify.
- TAN18 visibility splays cannot be achieved and insufficient space for passing vehicles to access / egress site at the same time as a caravan.
- proposed development would result in an intensification of the use of the access and the use by longer and less manoeuvrable vehicles than those generally accessing a pub car park.

Drainage / flooding

- No surface water drainage details provided.
- Additional runoff from hardstanding proposed may increase risk of flooding to surrounding land.
- Grey water is often visible in ditches to north and east of site (consider this could be discharge from existing septic tank) – ditches discharge into river.
- Chemical toilet disposals should not discharge into septic tanks.

Ecology:

- Planting proposed includes non-native species.
- No ecology assessment submitted / site may support protected species.

Other:

Concerns have been raised in public responses regarding the adequacy of the Caravan and Motorhome Club consultation in respect of the licensing of the site. Officers consider that these comments relate to separate non-planning legislation and are therefore not material planning considerations.

In support

Representations received from:

Maureen Roberts, 27 Harlech Crescent, Prestatyn  
 Richard Jones, 4 Bryn Ibod, Waen  
 Caroline Evans, 3 Bryn Ibod, Waen  
 Chris Moore, 13 Cilgant, Eglwys Wen, Bodelwyddan  
 Lindsay Thring, 74 Ffordd Idwal, Prestatyn  
 Nicky Pattison, 2 Bryn Ibod, Waen  
 Karen Dean, 34 Highlands Road, Rhuddlan  
 David Jackson, 15 Tynewydd Road, Rhyl  
 Derrick Jones, Bryn Ibod Farm, Tremeirchion  
 Marina Hatenoer, The Nook, Trefnant

Janet Newman-Carty, 13 Llys Ogwen, Prestatyn  
Lowri Williams, Jacobs Ladder, Chester Street, St. Asaph  
Lynsey Lloyd-Thomas, 23 Gronant Road, Prestatyn  
Nuala Lloyd-Thomas, 23 Gronant Road, Prestatyn

Summary of planning based representations in support:

**Principle**

- Hospitality businesses have been adversely impacted by Covid19 & businesses need to diversify to survive.
- Proposal would help the existing business adapt & diversify.
- Supports local jobs.
- Encourages tourism to the area.
- Positive attribute for the local area & would support local economy.
- As more attractions and hospitality business open in the area there is need to provide a place where people holidaying here can stay.
- Visitors use local shops and services.

**Visual amenity:**

- Planting and landscaping is attractive.
- Fits in with surrounding landscape.
- Proposal has improved visual appearance of the site.
- New planting will help screen the site.
- Small development at end of carpark would not impact the local community.

**EXPIRY DATE OF APPLICATION: 02/06/2020**

**EXTENSION OF TIME AGREED? 3/9/2020**

**REASONS FOR DELAY IN DECISION (where applicable):**

- additional information required from applicant
- re-consultations / further publicity necessary on amended plans and / or additional information
- awaiting consideration by Committee

**PLANNING ASSESSMENT:**

**1. THE PROPOSAL:**

**1.1 Summary of proposals**

- 1.1.1 The proposal is for operational development associated with the use of land as a 'Certified Location' caravan site.
- 1.1.2 Members should note that the use of land as 'Certified Location' caravan site would fall within permitted development rights and therefore the change of use of land does not form part of the application. Please see section 1.7 below for further clarification on this issue.
- 1.1.3 The operational development subject of the application includes:
- Formation of a new vehicular access into the site from the existing pub carpark, which is served by an existing vehicular access off the public highway.
  - Formation of internal access tracks formed with stone base and crushed aggregate / gravel surface.
  - Laying stone base to caravan pitches which have been soiled over and re-turfed.
  - Installation a drinking water tap.
  - Installation of 5 no. electricity hook up points.
  - Installation of a chemical toilet waste disposal facility with rinsing tap.
  - Formation of a wildlife pond and landscaping within the site.

1.1.4 The application is retrospective in nature and majority of works have already been carried out.

1.2 Other relevant information/supporting documents in the application

1.2.1 Additional highway information including details of visibility splays and swept path analysis were provided during the course of the application to demonstrate that towed caravans can access and exit the site via the existing carpark vehicular access, and can manoeuvre within the site, without detriment to highway safety.

1.2.2 An additional planning statement was also submitted to address concerns raised in public consultation responses.

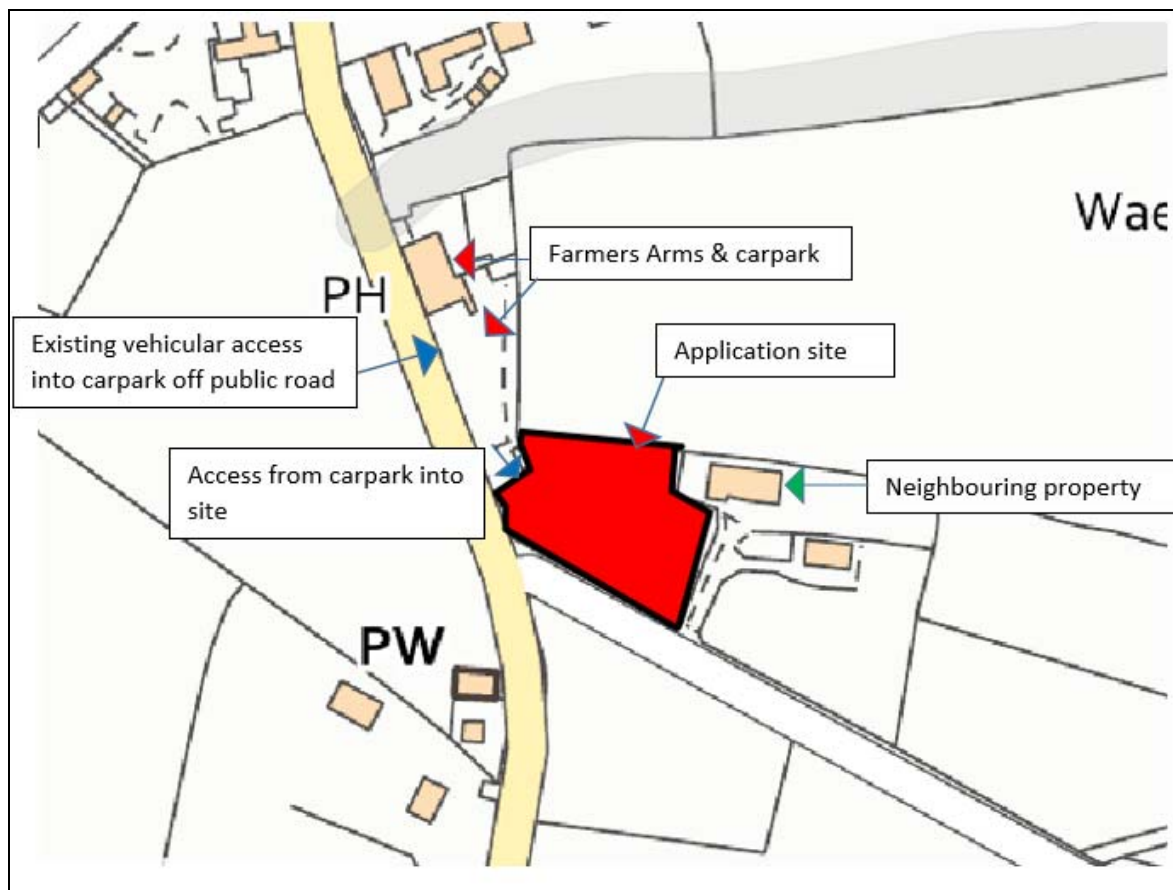
1.3 Description of site and surroundings

1.3.1 The Farmers Arms is situated along a minor road (Brynibod junction to A55) in the village of Waen and the site is a small field which is immediately adjacent to the pub carpark. A field gate previously provided access into the field from the car park.

1.3.2 The carpark is served by an existing vehicular access is off the B5429.

1.3.3 There is a residential dwelling to the east of the site known as Bwthyn Arthur, to the north lies agricultural fields and to the south the site abuts the public highway.

1.3.4 The plan below shows the relationship between the site and the Farmer's Arms:



1.4 Relevant planning constraints/considerations

- 1.4.1 The site lies outside of any established development boundary and is therefore considered to lie within the open countryside.

**1.5 Relevant planning history**

- 1.5.1 None.

**1.6 Developments/changes since the original submission**

- 1.6.1 Additional highway information and a supporting statement has been submitted during the course of the application.

**1.7 Other relevant background information**

- 1.7.1 It is noted that a number of objections received relate to the use of land as a caravan site.

- 1.7.2 For clarity the use of land as a caravan site which has been certified by an 'exempted organisation' such as the Caravan and Motorhome Club to be used by not more than five caravans at any time would fall within permitted development rights by virtue of Part 5 of Schedule 2 to the Town and County Planning (General Permitted Development) Order 1995 (as amended).

- 1.7.3 Sites which fall within these permitted development rights are referred to as 'Certified Locations'.

- 1.7.4 The applicants have applied to the Caravan and Motorhome Club for the site to become a Certified Location, and a letter dated 13 March 2020 has been submitted with the application which confirms the Caravan and Motorhome Club are happy to proceed with the application for the site to become a Certified Location.

- 1.7.5 Once certified, the use of land as a caravan site would be permitted development, and accordingly the change of use of land is not for debate at this time.

- 1.7.6 Officers would also take the view that the formation of a vehicular access from the existing pub carpark (which is already served by a vehicular access point from the public highway) could be considered to fall within permitted development rights under Part 2 of the 1995 Order, however given the concerns raised by the local community, additional information was sought regarding the visibility at the existing access and turning space within the site for caravans.

- 1.7.7 The applicant has also made improvements to the existing vehicular access with the public highway to improve the visibility, including repositioning the gates further within the site to provide visibility splays and car parking bays within the carpark have been stepped back slightly prevent park cars next to the access blocking sight lines. Officers would note these works to the vehicle access have been carried out under permitted development rights and do not form part of the application.

- 1.7.8 On the matter of surface water drainage, developments involving a construction area of more than 100sq.m may be subject to the Sustainable Urban Drainage (SuDs) approval process, and a separate consent from Denbighshire County Council as the appointed SuDS Approval Body would be required in addition to planning consent.

**2. DETAILS OF PLANNING HISTORY:**

- 2.1 N/A

**3. RELEVANT POLICIES AND GUIDANCE:**

The main planning policies and guidance are considered to be:

**3.1 Local Policy/Guidance**

Denbighshire Local Development Plan (adopted 4<sup>th</sup> June 2013)

**Policy PSE5** – Rural economy



## Policy VOE5 – Conservation of Natural Resources

### Supplementary Planning Guidance

Supplementary Planning Guidance Note: Conservation and Enhancement of Biodiversity

Supplementary Planning Guidance Note: Caravans, Chalets & Camping

### 3.2 **Government Policy / Guidance**

Planning Policy Wales (Edition 10) December 2018

Development Control Manual November 2017

Technical Advice Note (TAN) 18: Transport (2007)

### 3.3 **Other material considerations**

## 4. MAIN PLANNING CONSIDERATIONS:

In terms of general guidance on matters relevant to the consideration of a planning application, Section 9.1.2 of the Development Management Manual (DMM) confirms the requirement that planning applications 'must be determined in accordance with the approved or adopted development plan for the area, unless material considerations indicate otherwise'. It advises that material considerations must be relevant to the regulation of the development and use of land in the public interest, and fairly and reasonably relate to the development concerned. The DMM further states that material considerations can include the number, size, layout, design and appearance of buildings, the means of access, landscaping, service availability and the impact on the neighbourhood and on the environment (Section 9.4).

The DMM has to be considered in conjunction with Planning Policy Wales, Edition 10 (December 2018) and other relevant legislation.

The following paragraphs in Section 4 of the report therefore refer to the policies of the Denbighshire Local Development Plan, and to the material planning considerations which are considered to be of relevance to the proposal.

4.1 The main land use planning issues in relation to the application are considered to be:

- 4.1.1 Principle
- 4.1.2 Visual amenity
- 4.1.3 Residential amenity
- 4.1.4 Ecology
- 4.1.5 Drainage (including flooding)
- 4.1.6 Highways (including access and parking)

4.2 In relation to the main planning considerations:

#### 4.2.1 Principle

In terms of the national planning policy context, Planning Policy Wales 10 (December 2018) paragraph 3.56 states that development in the countryside should be located within and adjoining those settlements where it can be best be accommodated in terms of infrastructure, access and habitat and landscape conservation. It also advises that new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should be of a scale and design that respects the character of the surrounding area.

The Community Council and a number of public representations received have raised concerns regarding the principle of the use of land as a caravan site. However, as detailed in section 1.7 above, the site would be operated as a Caravan and Motorhome 'Certification Location', meaning the use of land as a caravan site for not more than five caravans would fall within permitted development rights. Planning permission is therefore not required for the change of use of land to a caravan site

and the merits or otherwise of a such a use in this location are not the subject of this application.

The application currently before the Council is limited to the associated operational development, which including formation of internal access tracks; laying hardcore below caravan pitches which have now been turfed over; installation of electricity hook up points, a chemical toilet disposal unit and a drinking tap; and associated landscaping.

Whilst public representations have noted that the proposed works exceed the minimum required infrastructure for a Certified Location caravan site, that does not preclude the applicant from providing enhanced facilities at the site and any operational development proposed should be assessed on its own merits.

Having regard to the permitted use of the site as a caravan site, Officers would conclude that associated development on the site would be acceptable in principle, subject to an assessment of detailed impacts which are set out in the remainder of the report.

#### 4.2.2 Visual amenity

The Development Management Manual advises at paragraph 9.4.3 that material considerations must be fairly and reasonably related to the development concerned, and can include the number, size, layout, design and appearance of buildings, the means of access, landscaping, service availability and the impact on the neighbourhood and on the environment; and the effects of a development on, for example, health, public safety and crime. The visual amenity and landscape impacts of development should therefore be regarded as a potential material consideration.

Objections have been raised by the Town Council and members of the public on visual amenity grounds.

Officers would note that the use of land as a caravan site is not subject of the application and the assessment of impact on visual amenity is limited to the operational development proposed.

The site is located between a pub carpark to the west and a residential property to the east. To the north the site abuts open fields and to the south the site abuts a public highway.

Whilst the site is located outside of development boundaries, is well related to the public house and is enclosed between the car and the neighbouring residential property. Whilst the new internal access tracks have reduced the extent grassed area within the site, Officers would note the hardcore laid below the pitches has now been re-turfed over, and other infrastructure such as hook up points, water tap and chemical toilet disposal unit are very minor in scale and having regard to the scale and nature of the proposal, the operational works proposed would not detract from the rural character of the local area..

Whilst concerns have been raised that the planting and landscaping proposed does not adequately screen the site, given the permitted use of the land as a caravan site, Officers would note that the planting and landscaping proposed is not put forward as a mitigation or compensation measure to offset harm from the operational development proposed, but rather as enhancement features to improve the aesthetics of the site.

Officers would further note the planting proposed could be carried out without the need for planning permission, and therefore Officers do not consider there are any reasonable planning grounds to require alternative or additional planting to be provided within the site.

With respect to the pond, having regard to its size and extent of works carried out to construct it, Officers would consider it a borderline case as to whether this constitutes development or if it would be considered to be de minimus works. Nevertheless, having regard to the permitted use of land as a caravan site, the formation of a small pond within the site would be acceptable, and it would not give rise to adverse impacts on visual amenity.

Having regard to the design, siting and scale of the operational development proposed, in relation to the locality and landscape, it is considered the proposals would not have an unacceptable impact on visual amenity and would therefore be in general compliance with the tests in the policies referred to.

#### 4.2.3 Residential amenity

The Development Management Manual advises at paragraph 9.4.3 that material considerations must be fairly and reasonably related to the development concerned, and can include the number, size, layout, design and appearance of buildings, the means of access, landscaping, service availability and the impact on the neighbourhood and on the environment; and the effects of a development on, for example, health, public safety and crime. The residential amenity impacts of development should therefore be regarded as a potential material consideration.

Objections have been raised by the Town Council and members of the public on residential amenity grounds, which mainly relate to the impact of a caravan site in such close proximity to the property in terms of outlook, privacy, noise and disturbance.

The eastern boundary of the site abuts the residential curtilage of the neighbouring property, Bwthyn Arthur.

Whilst it is acknowledged that the operation of a caravan site next door to a residential property may impact upon the level of amenity currently enjoyed by that property, Officers would reiterate again that as the use of land is permitted development, and therefore the impact of a caravan site in this location is not for debate and the assessment of impact on the neighbouring property has to be limited to the operational development which is subject of the application.

Nevertheless, planting is proposed along the boundary with the neighbouring property in an effort to help mitigate the impact of the permitted caravan use of the land.

Having regard to the scale, location and design of the operational development put forward, it is considered that the proposals would not have an unacceptable impact on residential amenity of the neighbouring property or other properties in the vicinity of the site, and the proposal would therefore be in general compliance with the tests of the policies referred to.

#### 4.2.4 Ecology

Policy VOE 5 requires due assessment of potential impacts on protected species or designated sites of nature conservation, including mitigation proposals, and suggests that permission should not be granted where proposals are likely to cause significant harm to such interests.

This reflects policy and guidance in Planning Policy Wales (Section 6.4), current legislation and SPG 18 – Nature Conservation and Species Protection, which stress the importance of the planning system in meeting biodiversity objectives through promoting approaches to development which create new opportunities to enhance biodiversity, prevent biodiversity losses, or compensate for losses where damage is unavoidable.

Objections have been raised by members of the public on ecological grounds.

An ecological assessment has not been provided with the application.

Whilst the site is a greenfield site located in open countryside, having regard to the nature and scale of the proposed works, and that no existing trees or hedgerow were proposed to be removed, and ecological assessment was not considered necessary.

Whilst concerns have been raised that the planting and landscaping proposed includes non-native species, given the permitted use of the land as a caravan site, Officers would note that the planting and landscaping proposed is not put forward as a mitigation or compensation measure to offset harm from the operational development proposed, but rather as enhancement features to improve the aesthetics of the site. Officers also note that additional planting and the formation of the pond would provide opportunities for wildlife.

Officers would further note the planting proposed could be carried out without the need for planning permission, and therefore Officers do not consider there are any reasonable planning grounds to require alternative planting to be provided within the site.

#### 4.2.5 Drainage (including flooding)

The Development Management Manual advises at paragraph 9.4.3 that material considerations must be fairly and reasonably related to the development concerned, and can include the number, size, layout, design and appearance of buildings, the means of access, landscaping, service availability and the impact on the neighbourhood and on the environment; and the effects of a development on, for example, health, public safety and crime. The drainage and flood risk impacts of development should therefore be regarded as a potential material consideration.

Concerns have been raised by Town Council and members of the public on drainage grounds.

The Council's Drainage Officer has considered that the proposal would need separate SAB approval and in making its decision the SAB will take account of any local knowledge or concerns regarding drainage.

NRW has raised no objection to the proposal, but has provided advice with respect to the discharge from the chemical toilet disposal unit into the septic tank.

Objections have also be raised on grounds of water pollution, as ditches have been referred to as having 'grey water' which representations allege is as a result of discharges from the existing septic tank. Concerns have also been raised that chemical toilet waste would discharge into the ditches.

The supporting statement submitted notes the applicants have liaised with NRW on the chemical toilet disposal unit and that they will ensure suitable biodegradable products only are used by visitors in their caravans toilets to ensure it can discharge to the septic tank. Officers would note that septic tanks and any discharges from it to land would be subject to separate environmental permitting requirements.

The tracks have been formed by stone hardcore base, and surfaced with aggregate and are stated to be permeable. The pitches have been laid with a stone hardcore base which has been soiled over and re-turfed and are also stated to be permeable.

It is understood ditches run along the boundary of the site, which drainage from the land runs into and members of the public have raised concerns that the development would increase run off and lead to flooding offsite.

On the matter of surface water drainage, Officers would note that as the tracks exceed 100sq.m in area, the proposal would be subject to the Sustainable Urban Drainage (SuDs) approval process. Drainage officers have raised no objection with the principle of the proposal on drainage grounds and therefore as separate consent from the SuDS Approval Body would be required in addition to planning consent, Officers do not consider it necessary to request additional drainage details as it would duplicate other regulatory controls.

Having regard to the above, and the controls that would be applied through separate environmental permitting and SuDs approval process, Officers would conclude that the proposal would not give rise to unacceptable impacts on the interests listed above.

#### 4.2.6 Highways (including access and parking)

The Development Management Manual advises at paragraph 9.4.3 that material considerations must be fairly and reasonably related to the development concerned, and can include the number, size, layout, design and appearance of buildings, the means of access, landscaping, service availability and the impact on the neighbourhood and on the environment; and the effects of a development on, for example, health, public safety and crime. The highway impacts of development should therefore be regarded as a potential material consideration.

Policy ASA 3 requires adequate parking spaces for cars and bicycles in connection with development proposals, and outlines considerations to be given to factors relevant to the application of standards. These policies reflect general principles set out in Planning Policy Wales (PPW) and TAN 18 – Transport, in support of sustainable development.

The Parking Standards in New Developments SPG sets out the maximum parking standards for new developments.

Concerns have been raised by the Community Council and members of the public on highway safety grounds in terms of visibility and road speeds.

Officers would stress again that the use of land as a caravan site is considered to be permitted development, and therefore the assessment of the proposal on highway safety has to be limited to the impact of the proposed operational development and not the use of land.

The site would be accessed from the highway via the existing pub carpark vehicular access and then via the proposed new access into the site from the carpark. Whilst a new access off the highway is not required, details of visibility splays and swept path analysis were requested to demonstrate caravans on tow could safety access the site and manoeuvre within it.

The applicant has also sought to step back the gates at the carpark access to improve visibility and step a parking bay further in the site to prevent parked cars obscuring visibility sight lines. Officers would note these works do not form part of the proposal and have been carried out under permitted development rights.

Highway Officers have considered the proposal, having regard to the fact the use of land as a caravan site would be permitted development and acknowledging the site would utilise an existing access off the highway.

Highways Officers are satisfied that caravans can safety manoeuvre within the site, and whilst there is a shortfall in visibility standards at the existing access with the highway, Highway Officers recognise that improvements have been made to the existing access and note there should be scope for a limited redevelopment that

incorporates a substantial access improvement, even though the improved access would still be below standard.

Highways Officers have advised that there have been no reported accidents in the last five years and given the restricted use of this small scale development and the submitted details, Highways Officers do not foresee any highway related issues arising from the development and therefore have no objection to the proposals. Notwithstanding the concerns raised by the Community Council and local residents, Officers consider the proposal has to be based on the proposals put forward and not on the use of land, and accordingly the proposal is not adjudged to give rise to any unacceptable impacts on highway safety.

#### Other matters

##### Well – being of Future Generations (Wales) Act 2015

The Well-being of Future Generations (Wales) Act 2015 imposes a duty on the Council not only to carry out sustainable development, but also to take reasonable steps in exercising its functions to meet its sustainable development (or well-being) objectives. The Act sets a requirement to demonstrate in relation to each application determined, how the development complies with the Act.

The report on this application has taken into account the requirements of Section 3 'Well-being duties on public bodies' and Section 5 'The Sustainable Development Principles' of the Well-being of Future Generations (Wales) Act 2015. The recommendation is made in accordance with the Act's sustainable development principle through its contribution towards Welsh Governments well-being objective of supporting safe, cohesive and resilient communities. It is therefore considered that there would be no significant or unacceptable impact upon the achievement of well-being objectives as a result of the proposed recommendation.

## **5. SUMMARY AND CONCLUSIONS:**

- 5.1 The proposal is for operational development associated with the use of land as a 'Certified Location' caravan site which includes formation of a new internal access from the existing pub carpark, internal access tracks, electricity hook up points, water tap, chemical toilet disposal unit and associated landscaping.
- 5.2 Members are reminded the use of land as a 'Certified Location' caravan site to be used by not more than five caravans is permitted development, and therefore the use of land is not subject of the application, and the assessment of impacts is solely based on the operational development.
- 5.3 Objections have been received by the Community Council and local residents on a number of grounds, however a number of representations in support of the proposal have also been received.
- 5.4 Notwithstanding the concerns raised, having regard to the Having regard to the scale and nature of the operational development put forward, the potential impacts on the locality, and the particular tests of the relevant policies, the application is considered to be acceptable and is recommended for grant.

### **RECOMMENDATION: GRANT-** subject to the following conditions:-

1. The development to which this permission relates shall be begun no later than 2nd September 2025
2. The development hereby permitted shall be carried out in strict accordance with details shown on the following submitted plans and documents unless specified as otherwise within any other condition pursuant to this permission:
  - (i) Caravan Club Documentation (4 Documents) - Received 13 March 2020
  - (ii) Existing Site Plan - Received 13 March 2020

- (iii) Electric Hook Up Specification (Drawing No. Fig 1) - Received 13 March 2020
- (iv) Tap Specification (Drawing No. Fig 2) - Received 13 March 2020
- (v) Septic Tank Cover Information (Drawing No. Fig 3) - Received 13 March 2020
- (vi) Additional Septic Information - Received 30 March 2020
- (vii) Proposed Site Plan - Received 13 March 2020
- (viii) Location Plan - Received 13 March 2020
- (ix) Access Arrangements Plan - Received 30 April 2020
- (x) Additional Plan - Received 30 April 2020
- (xi) Swept Path Analysis Plan (1493/01 Rev A) - Received 5 June 2020
- (xii) Visibility Splay Plan (1493/02 Rev A) - Received 11 June 2020
- (xiii) Highway Issues Report (1493 HA) - Received 5 June 2020
- (xiv) Planning Support Statement - 8 June 2020
- (xv) Access Plans (2 Drawings) - Received 5 June 2020

The reasons for the conditions are:-

1. To comply with the provisions of Section 91 of the Town and Country Planning Act 1990.
2. For the avoidance of doubt and to ensure a satisfactory standard of development.